

## PRE-APPEAL BRIEF REQUEST FOR REVIEW

Docket Number (Optional)

555255-012436

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on 09/06/2007

Signature

Typed or printed name

Debra Pejeau

Application Number

10/611,519

Filed

07/01/2003

First Named Inventor

Vadim Fux

Art Unit

2174

Examiner

Ke, Peng

Applicant requests review of the final rejection in the above-identified application. No amendments are being filed with this request.

This request is being filed with a notice of appeal.

The review is requested for the reason(s) stated on the attached sheet(s).

Note: No more than five (5) pages may be provided.

I am the

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applicant/inventor.

☐

assignee of record of the entire interest.

See 37 CFR 3.71. Statement under 37 CFR 3.73(b) is enclosed.  
(Form PTO/SB/96)

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NOTE: Signatures of all the inventors or assignees of record of the entire interest or their representative(s) are required. Submit multiple forms if more than one signature is required, see below\*.

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\*Total of \_\_\_\_\_ forms are submitted.

This collection of information is required by 35 U.S.C. 132. The information is required to obtain or retain a benefit by the public which is to file (and by the USPTO to process) an application. Confidentiality is governed by 35 U.S.C. 122 and 37 CFR 1.11, 1.14 and 41.6. This collection is estimated to take 12 minutes to complete, including gathering, preparing and submitting the completed application form to the USPTO. Time will vary depending upon the individual case. Any comments on the amount of time you require to complete this form and/or suggestions for reducing this burden, should be sent to the Chief Information Officer, U.S. Patent and Trademark Office, U.S. Department of Commerce, P.O. Box 1450, Alexandria, VA 22313-1450. DO NOT SEND FEES OR COMPLETED FORMS TO THIS ADDRESS. SEND TO: Mail Stop AF, Commissioner for Patents, P.O. Box 1450, Alexandria, VA 22313-1450.

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IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

Attorney Docket No. 555255-012436

Group Art Unit: 2174 )  
Examiner: Peng Ke )  
Inventor: Vadim Fux )  
Serial No.: 10/611,519 )  
Filed: July 1, 2003 )  
For: System and Method for )  
Intelligent Text Input )

**PRE-APPEAL BRIEF  
REQUEST FOR REVIEW**

Mail Stop AF  
Commissioner for Patents  
P.O. Box 1450  
Alexandria, VA 22313-1450

Dear Sirs:

The Examiner has finally rejected claims 1-17 of the instant application under 35 U.S.C. § 103(a). The rejection of the claims under 35 U.S.C § 103(a) is now appealed. The Assignee hereby requests review of the final rejection prior to filing an appeal brief for the reasons set forth below. The final rejection fails to make a *prima facie* case of unpatentability and there is clear error in the rejections of these claims. Any fees due should be charged to Jones Day Deposit Account No. 501432, ref: 555255-012436.

**The Rejections of Independent Claims 1, 14, and 16 Are Clearly  
Erroneous and Fail to Make a Prima Facie Case of Obviousness**

Neither of the references that form the basis of the rejections of claims 1, 14, and 16 under 35 U.S.C. § 103(a) discloses directing a platform-independent event, translated from a text input event, to one of a plurality of input methods based in part on the text input component that received the text input event, as recited in claims 1, 14, and 16. In other words, the recited subject matter enables a mobile device to interpret text input events in different languages depending on which text input component receives the text event. The Flanagan reference (U.S. Patent No. 6,292,769), which the final office action cites in rejecting claim 1, discloses interpreting text input events in only a single language. Thus, Flanagan does not disclose the limitation against which it is cited, and the rejection of claim 1 is clearly erroneous. Due to this and other distinctions from the cited references, the rejections of claims 1, 14, and 16 are improper and cannot stand.

Claim 1 recites an intelligent text input system for a mobile device, including a text input directing engine being “operable to direct the platform-independent event to one of the plurality of input methods based on the text input component that received the text input event.” Similar limitations are also included in independent claims 14 and 16. Aspects of the subject matter recited in the independent claims are described in further detail in the specification. The specification explains that example text input components 702 may include the recipient (“to”) field 802 or copy (“cc”) field 804 in the graphical user interface 800 for an electronic messaging application. (See p. 8, lines 7-10). Further, text input components 702 may be restricted to certain types of textual input. (See p. 8, lines 5-6). For example, the recipient field of an e-mail created using an electronic messaging application is an example of a text input component 102 that might require text input events to be sent to an English language input method 110, while

another component, such as the message field, could send text input events to different input methods 110. (See p. 4, line 21 – p. 5, line 2). When the text input directing engine 704 receives an input-restricted text input event from a text input component 702, it converts the text input event into a platform-independent event and associates the platform-independent event with one or more characters from a language and device specific mapping table. (See p. 8, lines 11-15). The text input directing engine 704 then accesses the active input method 710 to apply language specific input logic functions. (See p. 8, lines 15-16).

The cited references do not disclose anything about the use of a text input directing engine to direct platform-independent text input events to a plurality of input methods based on the text input component that received the text input event, as stated in the final office action. The final office action erroneously concludes that the Flanagan reference discloses, at col. 14, lines 30-55, the text input directing engine being further operable to direct the platform-independent event to one of the plurality of input methods based on the text input component that received the text input event, wherein a plurality of text input events may be translated to platform-independent events and directed to different ones of the plurality of input methods, as recited in claim 1.<sup>1</sup> An examination of the Flanagan reference reveals, though, that this conclusion is erroneous. Flanagan describes a system for automated translation of speech. Figure 6B of Flanagan<sup>2</sup> shows clearly that a user using the system sees all messages, whether input by that user or other remote users, in a single language, namely the same language in which the user inputs his or her messages. Indeed, Flanagan makes clear that the purpose of the system is to translate users' messages. The summary of the invention states, "Speech-to-speech chat or

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<sup>1</sup> The office action states that the rationale for rejecting independent claims 14 and 16 was the same as the rationale for rejecting claim 1.

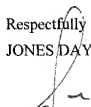
<sup>2</sup> Fig. 6B is described in part at col. 14, lines 30-55, the same passage cited in the office action.

conferencing is achieved in accordance with machine translation of communications such that subscribers can speak and hear in their native languages messages which may have been translated from other languages.” (Col. 2, lines 42-46). What is more, Flanagan states that the translation is performed by “[m]achine translation software (i.e., language translation software) that is resident at the online information service or computer network.” (Col. 2, lines 31-33).

Contrary to the assertion in the final office action, the system disclosed in Flanagan does not teach the recited subject matter of claims 1, 14, and 16. As shown above, Flanagan only discloses entering text in a single language. The subject matter recited in claims 1, 14, and 16, however, permits text input events in text input components to be directed to input methods corresponding to multiple languages, depending on which text component receives the text input event. (See p. 4, line 21 – p. 5, line 2).

For at least these reasons, the Assignee submits that the rejection of claims 1, 14, and 16 is clearly in error and must be withdrawn. Claims 2-13, 15, and 17 all ultimately depend from claims 1, 14, and 16, and thus they also are patentable. The Panel is therefore respectfully requested to withdraw the rejection of claims 1-17 and pass this case to issue.

Respectfully submitted,  
JONES DAY



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